

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Pursuant to Civil Local Rules 79-5 and 7-11 and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal the following Documents (or portions thereof as indicated below):

	Document	Portions Sought to be Sealed
1	Plaintiffs’ Response in Reply to Defendant Facebook, Inc.’s Request to Enforce the Partial Stay of Discovery in Pretrial Order No. 20 and In Support of Cross-Motion to Compel	Limited Portions of paragraphs in Section I at 1-2; Section II.A at 4; Section II.B at 6-7, 8, 9.
2	Exhibit F	The 2 pages comprising Exhibit F, Bates Numbered FB-CA-MDL-00203262- FB-CA-MDL-00203263 to Plaintiffs’ Opposition designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.
3	Exhibit G	The 14 pages comprising Exhibit G, Bates Numbered FB-CA-MDL-01119012- FB-CA-MDL-01119025 to Plaintiffs’ Opposition designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.

The above-listed documents contain or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action. *See* Declaration of Lesley E. Weaver (“Weaver Decl.”) ¶ 8.

As the designating party, Defendant Facebook, Inc. must file a declaration establishing that all of the designated material is sealable. *See* Civil L.R. 79-5(e)(1).

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: October 19, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/Lesley E. Weaver
Lesley E. Weaver

Derek W. Loeser (admitted *pro hac vice*)
Lynn Lincoln Sarko (admitted *pro hac vice*)
Gretchen Freeman Cappio (admitted *pro hac vice*)
Cari Campen Laufenberg (admitted *pro hac vice*)
David J. Ko (admitted *pro hac vice*)
Benjamin Gould (SBN 250630)
Adele Daniel (admitted *pro hac vice*)
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com
lsarko@kellerrohrback.com
gcappio@kellerrohrback.com
claufenberg@kellerrohrback.com
dko@kellerrohrback.com
bgould@kellerrohrback.com
adaniel@kellerrohrback.com

Lesley E. Weaver (SBN 191305)
Anne K. Davis (SBN 267909)
Matthew P. Montgomery (SBN 180196)
Angelica M. Ornelas (SBN 285929)
Joshua D. Samra (SBN 313050)
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com
adavis@bfalaw.com
mmontgomery@bfalaw.com
aornelas@bfalaw.com
jsamra@bfalaw.com

Christopher Springer (SBN 291180)
801 Garden Street, Suite 301
Santa Barbara, CA 93101
Tel.: (805) 456-1496
Fax: (805) 456-1497
cspringer@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of October, 2020, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2020, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the CM/ECF system. In accordance with Civil L.R. 5-1(h) and Civil L.R. 79-5(e), I also caused a copy of the under seal documents to be served via email on counsel of record for all parties. An electronic copy of the public redacted filings was also provided via email to the parties noted below:

Anjeza Hassan
annie.sara@yahoo.com

/s/ Lesley E. Weaver

Lesley E. Weaver